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VIA ECF AND EMAIL

Hon. John P. Cronan
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1320
New York, New York 10007
CronanNYSDChambers@nysd.uscourts.gov

Re: Alex Goldfarb v. Channel One Russia, 18-cv-08128 (JPC)

Dear Judge Cronan:

We are counsel for Defendant Channel One Russia in this matter and respectfully submit this letter pursuant to Rule 1(A) of Your Honor's Individual Rules and Practices in Civil Cases. The current Case Management Order provides:

March 7, 2022:	close of fact discovery
April 21, 2022:	close of expert discovery
April 28, 2022:	joint post-discovery status letter due

One remaining Channel One Russia witness was scheduled for a deposition in early March. However, due to intervening geopolitical events (namely the ongoing Russo-Ukrainian conflict), that witness became temporarily unavailable. Channel One Russia remains committed to producing this witness. In addition, the parties anticipate some additional document production from Plaintiff following his deposition late last week.

The parties believe it prudent to—and have agreed to—continue fact discovery in order to complete the two discrete items above. However, the parties believe that this can be accomplished without impacting the Case Management Schedule or downstream dates. Indeed, the next discovery period (experts) can proceed in parallel with concluding minor outstanding fact discovery. The parties believe that the open items described above can be completed by March 23, 2022.

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In light of the parties' agreement, and in light of the fact that no modification to the Case Management Schedule is requested, this letter is submitted for the purpose of keeping Your Honor informed of the status and putting the agreement in the record. We remain at the Court's disposal to provide any additional information requested.

Respectfully submitted,

/s/ Kendall E. Wangsgard

Kendall E. Wangsgard

Counsel for Channel One Russia

cc: All Counsel of Record (*via* ECF)